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Attorneys for Karen Gowins and numerous Wildfire Claimants

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

<i>In re:</i>	)	Case No. 19-30088-DM
PG&E CORPORATION	)	<b>JOINDER IN ABRAMS' MOTION TO</b>
-and-	)	<b>FILE SUPPLEMENT TO CLAIMS</b>
	)	<b>AGAINST PGE</b>
PACIFIC GAS AND ELECTRIC	)	Jointly Administered
COMPANY	)	
Debtors.	)	
<input type="checkbox"/> Affects PG&E Corporation	)	Judge: Hon. Dennis Montali
<input type="checkbox"/> Affects Pacific Gas & Electric	)	Date: March 22, 2023
<input checked="" type="checkbox"/> Affects Both Debtors	)	Time: 10:00 A.M.
	)	Location: Via Video/Teleconference or refer
	)	to <a href="http://www.canb.uscourts.gov/calendars">www.canb.uscourts.gov/calendars</a>
	)	U.S. Bankruptcy Court
	)	Courtroom 17
	)	450 Golden Gate Avenue
	)	16 <sup>th</sup> Floor
	)	San Francisco, CA 94102

This joinder is filed on behalf of Camp Fire victim Karen Gowins and the hundreds of fire victims we also represent, and who have filed Proofs of Claim in this Court.

Our client Karen Gowins and her husband, Richard, evacuated from their long-time home in Paradise, California due to the devastating Camp fire which occurred on November 8, 2018. Ms. Gowins was a member of the Official Tort Claims Committee (TCC) in this case and donated hundreds of hours to representing the interests of all fire victims in this case. Ms. Gowins resigned from the TCC in late 2020 since she opposed the proposed Plan of Reorganization

1 because it would create unacceptable risk to the Fire Victims, and, because other creditors were  
2 allowed to receive all cash settlements under the Plan. This would occur because the Fire Victims  
3 received 50% of their compensation in PG&E stock, placing their recoveries under severe risk of  
4 market declines. The allegations of the Motion specifically point to false and misleading  
5 statements by the Debtor which when they came to light resulted in declining share prices.  
6

7 It is now apparent that the value of the PG&E stock transferred to the Fire Victims' Trust  
8 will never be sufficient to allow payment to the Fire Victims of 100% of their evaluated claims.  
9 In fact, the Fire Victims have been intentionally "shorted" due to the Debtor's deliberate false  
10 misrepresentations concerning the extent and effectiveness of PG&E's safety measures.

11 The Fire Victims expected to receive \$13.5 billion to pay their claims and they will never  
12 receive that amount. There is no justification whatsoever for the Court to deny the Motion to  
13 allow the Fire Victims to file a supplemental claim based on the Debtor's misrepresentations  
14 outlined in the Motion. This is particularly true since the Court previously approved a Stipulation  
15 allowing Baupost, another creditor, to do precisely that.  
16

17 Importantly, our clients do not support any outcome of the Motion which would interfere  
18 with the administration of the Trust or delay the Trust functions in any way whatsoever. We are  
19 confident that a way can be found to allow the supplemental claims of the fire victims without  
20 adversely affecting the processing or payment of claims in any way.  
21

22 On behalf of our clients, we request that we and Thomas Tosdal of the Tosdal Law Firm,  
23 representing other joining fire victims, be permitted to present evidence and arguments as joining  
24 parties to this Motion.

25 Date: March 1, 2023

Respectfully submitted,

THE KANE LAW FIRM

26  
27 By: /s/ Steven S. Kane

STEVEN S. KANE  
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